

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

| | | |
|------------------------------------|---|----------------------|
| In the Matter of |) | |
| |) | |
| Carrier Current Systems, including |) | ET Docket No. 03-104 |
| Broadband Over Power Line Systems |) | |
| |) | |
| Amendment of Part 15 Regarding |) | ET Docket No. 04-37 |
| New Requirements and Measurement |) | |
| Guidelines for Access Broadband |) | |
| Over Power Line Systems |) | |

REPLY OF CORTLAND E. RICHMOND, JR.

TO

REPLY COMMENTS OF THE AMERICAN PUBLIC POWER ASSOCIATION

These Reply Comments are filed in response to Reply Comments in the referenced matter by the American Public Power Association, hereafter referred to as "APPA." The writer has been employed in the field of Radio Frequency Interference and Electromagnetic Compatibility in diverse technologies since 1983, has held an Amateur Radio license over 40 years, and spent more than 21 years in the Army working with and on communications systems and electronic equipment.

APPA writes:

II. Existing Part 15 radiation limits for Access BPL systems are sufficient for limiting harmful interference to licensed spectrum holders.

Reply:

APPA is operating under a misapprehension. Signals have been indeed been identified, at levels sufficient to cause radio interference to Amateurs and short-wave listeners, and complaints of harmful interference (as defined at Part 15 and Part 2) from BPL systems purporting compliance with Part 15 have indeed been filed.

Moreover, APPA should be aware -- it is a matter of arithmetic -- that the interference levels permitted by Part 15 can and have exceeded the level of signals received by short-wave listeners and Amateur radio operators up to more than a hundred meters from power lines supporting a BPL system. Given that power lines are usually much closer to residences, it is hard to escape the conclusion that Part 15 compliance cannot protect radio reception from a BPL system.

For these reasons, the writer urges the Commission to disregard the pleadings contained in the Reply Comment of the APPA to this proceeding.

Respectfully submitted,

Cortland E. Richmond, Jr.

22 June 2004